

P.O.Box 5173
Bergenfield, NJ 07621

andre@traviesolaw.com
O: 212-292-4557
C: 917-435-3700
F: 212-202-7631



ANDRÉ G. TRAVIESO
Admitted New York & New Jersey

September 13, 2021

VIA ELECTRONIC CASE FILING (ECF)

Honorable Judge Paul Oetken
United State District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States of America v. Akbar (1:20-CR-00563)

Dear Judge Oetken:

I file this letter motion on behalf of my client, Javian Moore, respectfully requesting that the conditions of Mr. Moore's bail are modified so that he may be allowed to travel to Atlanta, GA from September 30, 2021 through October 4, 2021. My client will be staying at his sister's home at 103 Galleria Lane SE, Smyrna, GA 30080. Jessica Holmes, his sister, can be contacted at 914-299-7798.

The defense has spoken with Mr. Moore's pre-trial officer, Francesca Piperato, regarding this proposed trip and pre-trial does not have any objections to this travel request. The Government defers to the decision of pre-trial services as to my client's travel.

Furthermore, Mr. Moore's change of plea hearing is scheduled for September 15, 2021.

Hence, we hereby request that Mr. Moore's bail conditions be modified in accordance with this proposed travel request.

Thank you in advance for your immediate attention to this matter.

Respectfully,

/s/ André G. Travieso

André G. Travieso
AGT/

Granted.
So ordered.
9/14/2021


J. PAUL OETKEN
United States District Judge

cc: AUSA Emily Johnson, AUSA Kaylan Lasky, AUSA Ashley Nicholas